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**YOUNG
CONAWAY**

June 12, 2025

HAND DELIVERY

The Honorable Craig T. Goldblatt
United States Bankruptcy Court
for the District of Delaware
824 North Market Street, 3rd Floor
Wilmington, Delaware 19801

Re: In re Joann Inc., et al. (Case No. 25-10068 (CTG))

Dear Judge Goldblatt:

We write regarding the proposed assumption and assignment by Joann, Inc. to Boot Barn Inc. (“Boot Barn”) of that certain lease of non-residential real property located at 1923 Old Fort Parkway, Murfreesboro, TN 37129 (as amended, the “Joann Murfreesboro Lease”), between Joann, Inc. and Integris Ventures TC, LLC, as landlord (the “Landlord”). In accordance with the Court-approved procedures, notice of the proposed assumption and assignment is contained in the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [D.I. 760]. Cavender Stores, L.P. (“Cavender”) has objected to assignment of the lease to Boot Barn [D.I. 863] and Boot Barn has filed a reply to that objection [D.I. 1002].

In an effort to reach a resolution without undue expense, all parties, including Boot Barn, Cavender, and the Landlord, have agreed to participate in mediation of the dispute. Towards that end, we respectfully request the Court approve of a mediation between the parties and appoint a current Delaware Bankruptcy Judge to act as mediator. If convenient to the appointed mediator, the parties would seek to schedule a one-day virtual mediation session for the week of June 30 or July 7.

In addition, we respectfully request that the Court schedule a hearing on this matter to go forward should the mediation prove unsuccessful. We understand that the Court plans to hear other matters in these chapter 11 cases on July 10, and if convenient to the Court, we ask that this matter be scheduled for that date as well. The parties are prepared to make themselves available should the Court have any questions regarding this matter.

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Sincerely,

YOUNG CONAWAY
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/s/ Robert S. Brady

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-and-

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